



Miedel & Mysliwiec LLP

October 22, 2020

Hon. Jesse M. Furman
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Robert Wilson, et. al. (19-CR-625 (JMF))

Dear Judge Furman,

Motions in this case, which is scheduled for trial on May 24, 2021, are due on November 2, 2020. Writing on behalf of the four defendants, I respectfully request a 45 day extension of the motions deadline. The government takes no position on this request.

As the Court is aware, communications between counsel and clients have been exceedingly difficult over the last seven months. Only very recently have in person legal visits commenced at the MCC and MDC, and many members of the bar continue to feel insufficiently safe entering those facilities, given the BOP's half-hearted and largely ineffectual efforts to provide safe environments for attorney-client visits. As a result, it has been difficult not only to effectively communicate with our clients, but to jointly go through discovery and determine whether motions are appropriate. Under pre-pandemic circumstances, the filing of motions would have been preceded by several visits and joint discovery review sessions, and the obtaining of affidavits from clients. Those kinds of discussions are considerably more difficult during time-limited video conferences.

That said, in-person visits have started and there is hope that conditions can be created to allow all counsel to feel comfortable enough to regularly visit their clients. We are optimistic that the next 45 days will allow those kinds of meetings to occur, and will allow counsel and their clients to make informed decisions about motion practice in this case. Since trial is still months away, an extension will have no impact on the parties' ability to be ready for trial in May, a date which we understand is firm.

Accordingly, the defendants in this case jointly request an extension of the motions deadline by approximately 45 days. As noted, the government takes no position on this request.

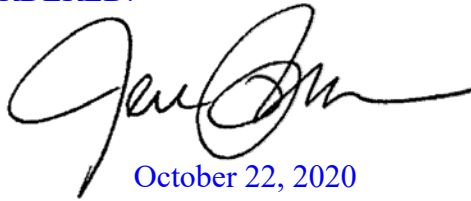
Respectfully,

/s/

Florian Miedel
Attorney for Marquis Yohanis

cc: All Counsel

Application GRANTED. Motions shall be filed by December 17, 2020; any opposition shall be filed by January 8, 2021; any replies shall be filed by January 15, 2021. The pretrial conference is ADJOURNED to January 18, 2021, at 2:30 p.m. The Government shall confer with defense counsel and submit a proposed order excluding time, if appropriate. The Clerk of Court is directed to terminate Doc. #81. SO ORDERED.

A handwritten signature in black ink, appearing to read "J. M. Jones", is written over the date. The signature is fluid and cursive.

October 22, 2020